

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

IN RE
Daniel C. Hoffman and Opal L. Hoffman

Debtors.

Chapter: 13

Case No. 24-11089-cjf

**OBJECTION OF NATIONSTAR MORTGAGE LLC TO CONFIRMATION OF THE CHAPTER
13 PLAN**

Nationstar Mortgage LLC, a secured creditor, by its attorneys, Gray & Associates, L.L.P., objects to the confirmation of the proposed plan on the following grounds:

1. The creditor holds a secured interest in the real estate located at W8110 Phillips Rd, Poynette, WI 53955-8801.
2. The plan does not comply with the provisions of Chapter 13 in that:
 - (a) The creditor has not accepted the plan;
 - (b) Though the allowed proofs of claim will control the amount disbursed by the trustee, the creditor's pre-petition mortgage arrearage is approximately \$90,649.78, which is greater than the estimated arrearage stated in the plan. Considering the other debts that are to be paid through the plan, the plan may not be feasible.
3. The foregoing prevents confirmation of the debtors' plan pursuant to 11 U.S.C. section 1325.

WHEREFORE, an objection is made to the confirmation of the plan, that a hearing upon this

Drafted by:

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Gray & Associates, L.L.P. is attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

objection be scheduled and that the clerk issue notice of said hearing to the appropriate parties and that the secured creditor be awarded such and further relief as the court may deem to be just and equitable.

Dated this 3rd day of July, 2024.

Gray & Associates, L.L.P.
Attorneys for Creditor

By: 

Christopher C. Drout
State Bar No. 1049882

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CERTIFICATE OF SERVICE

I hereby certify that on July 3rd, 2024, the objection to confirmation of plan was electronically filed in this case and served upon the following parties using the ECF system:

Mark W. Harring Trustee

Western District U.S. Trustee


Norman P. Moore, Jr.

I further certify that on the same date, I mailed the same document(s) by the United States Postal Service to the following non-ECF participants:

Daniel C. Hoffman
W8110 Phillips Rd
Poynette, WI 53955-8801

Opal L. Hoffman
W8110 Phillips Rd
Poynette, WI 53955-8801

Dated this 3rd day of July, 2024.


Justin Halstead, Supervisor
Gray & Associates, L.L.P.

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